



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

file
859145

September 29, 2008

NOTICE OF DEMAND FOR PAST COSTS

URGENT LEGAL MATTER - PROMPT REPLY NECESSARY

Via Certified Mail 7008 0150 0003 4922 6203



857145

Mr. James C. Morriss III, for Dow Chemical Company
Thompson & Knight LLP, 1900 San Jacinto Center
98 San Jacinto Blvd.
Austin, TX 78701-4081

RE: Dow Chemical Company and Demand for Reimbursement of Costs Expended at the
Gulfco Marine Maintenance Superfund Site, Freeport, Brazoria County, Texas
SSID No. 06JZ, EPA ID No. TXD055144539

Dear Mr. Morriss:

The United States Environmental Protection Agency (EPA) previously contacted potentially responsible parties (PRPs) regarding activities at the Gulfco Marine Maintenance Site (Site) located in Freeport, Brazoria County, Texas. In letters of July 14 and July 22, 2004, EPA notified you and other PRPs that you may be liable for costs expended by EPA for response actions under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended ("CERCLA"), commonly known as the federal Superfund law.

At that time, EPA also offered you and other PRPs the opportunity to take voluntary action necessary to abate any releases or threats of release of hazardous substances from the Site or to reimburse EPA for response actions taken. Because you declined to undertake the necessary actions, EPA issued you an Administrative Order (Order) to perform the Remedial Investigation/Feasibility Study, which was effective on July 29, 2005. On December 27, 2007, the Order was amended to add Parker Drilling Offshore Corporation (Parker) to the Order, with an effective date of January 31, 2008.

The EPA's July 2004 Notices included a Demand for Past Costs in the amount of \$162,707.07 to be reimbursed to the Superfund. This letter is to update the cost recovery demand amount to \$874,779.88.

Explanation of Potential Liability

Under Section 107(a) of CERCLA, PRPs may be held liable for all costs incurred by EPA (including interest) in responding to any release or threatened release of hazardous substances at the Site, unless the PRP can show any of the statutory defenses. PRPs include current and former owners and operators of the Site, as well as persons who arranged for treatment and/or disposal



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URGENT LEGAL MATTER - PROMPT REPLY NECESSARY

Via Certified Mail 7008 0150 0003 4922 6210

Mr. Alan Daniels for LDL Coastal Limited
Attorney & Counselor at Law
1177 West Loop South, Suite 1725
Houston, TX 77027

RE: LDL Coastal Limited and Demand for Reimbursement of Costs Expended at the Gulfco Marine Maintenance Superfund Site, Freeport, Brazoria County, Texas
SSID No. 06JZ, EPA ID No. TXD055144539

Dear Mr. Daniels:

The United States Environmental Protection Agency (EPA) previously contacted potentially responsible parties (PRPs) regarding activities at the Gulfco Marine Maintenance Site (Site) located in Freeport, Brazoria County, Texas. In letters of July 14 and July 22, 2004, EPA notified you and other PRPs that you may be liable for costs expended by EPA for response actions under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended ("CERCLA"), commonly known as the federal Superfund law.

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URGENT LEGAL MATTER - PROMPT REPLY NECESSARY

Via Certified Mail 7008 0150 0003 4922 6227

Mr. F. William Mahey for Sequa/Chromalloy Corporation
Strasberger Attorneys at Law
1401 McKinney Street, Suite 2200
Houston, TX 77010-4035

RE: Sequa/Chromalloy Corporation and Demand for Reimbursement of Costs Expended at
the Gulfco Marine Maintenance Superfund Site, Freeport, Brazoria County, Texas
SSID No. 06JZ, EPA ID No. TXD055144539

Dear Mr. Mahey:

The United States Environmental Protection Agency (EPA) previously contacted potentially responsible parties (PRPs) regarding activities at the Gulfco Marine Maintenance Site (Site) located in Freeport, Brazoria County, Texas. In letters of July 14 and July 22, 2004, EPA notified you and other PRPs that you may be liable for costs expended by EPA for response actions under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended ("CERCLA"), commonly known as the federal Superfund law.

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URGENT LEGAL MATTER - PROMPT REPLY NECESSARY

Via Certified Mail 7008 0150 0003 4922 6234

Mr. John R. Eldridge, for Parker Drilling Offshore
Haynes and Boone, LLP
1221 McKinney Street, Suite 2100
Houston, TX 77010

RE: Parker Drilling Offshore and Demand for Reimbursement of Costs Expended at the
Gulco Marine Maintenance Superfund Site, Freeport, Brazoria County, Texas
SSID No. 06JZ, EPA ID No. TXD055144539

Dear Mr. Eldridge:

The United States Environmental Protection Agency (EPA) previously contacted potentially responsible parties (PRPs) regarding activities at the Gulco Marine Maintenance Site (Site) located in Freeport, Brazoria County, Texas. In letters of July 14 and July 22, 2004, EPA notified you and other PRPs that you may be liable for costs expended by EPA for response actions under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended ("CERCLA"), commonly known as the federal Superfund law.

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URGENT LEGAL MATTER - PROMPT REPLY NECESSARY

Via Certified Mail 7008 0150 0003 4922 6241

Mr. Ron Potter, Vice President and General Counsel
Parker Drilling Offshore Corporation
1401 Enclave Parkway, Suite 600
Houston, TX 77077

RE: Parker Drilling Offshore and Demand for Reimbursement of Costs Expended at the
Gulfco Marine Maintenance Superfund Site, Freeport, Brazoria County, Texas
SSID No. 06JZ, EPA ID No. TXD055144539

Dear Mr. Potter:

The United States Environmental Protection Agency (EPA) previously contacted potentially responsible parties (PRPs) regarding activities at the Gulfco Marine Maintenance Site (Site) located in Freeport, Brazoria County, Texas. In letters of July 14 and July 22, 2004, EPA notified you and other PRPs that you may be liable for costs expended by EPA for response actions under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended ("CERCLA"), commonly known as the federal Superfund law.

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URGENT LEGAL MATTER - PROMPT REPLY NECESSARY

Via Certified Mail 7008 0150 0003 4922 6258

Mr. Ronald W. Hudson
34 Green Slope Place
The Woodlands, TX 77381

RE: Demand for Reimbursement of Costs Expended at the Gulfco Marine Maintenance
Superfund Site, Freeport, Brazoria County, Texas
SSID No. 06JZ, EPA ID No. TXD055144539

Dear Mr. Hudson:

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URGENT LEGAL MATTER - PROMPT REPLY NECESSARY

Via Certified Mail 7008 0150 0003 4922 6265

Mr. Jack Palmer
1509 Alta Vista
Alvin, TX 77511

RE: Demand for Reimbursement of Costs Expended at the Gulfco Marine Maintenance
Superfund Site, Freeport, Brazoria County, Texas
SSID No. 06JZ, EPA ID No. TXD055144539

Dear Mr. Palmer:

The United States Environmental Protection Agency (EPA) previously contacted potentially responsible parties (PRPs) regarding activities at the Gulfco Marine Maintenance Site (Site) located in Freeport, Brazoria County, Texas. In letters of July 14 and July 22, 2004, EPA notified you and other PRPs that you may be liable for costs expended by EPA for response actions under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended ("CERCLA"), commonly known as the federal Superfund law.

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Based on information collected and sent to you as enclosures to the July 2004 Notices, EPA believes that you may be liable under Section 107(a) of CERCLA with respect to the

BGA 9-10-08
Concurrence: Orig: B Aldridge, c: Gulfco updated Notice of Demand for Past Costs 9/10/08

G. Miller	B. Nann	L. Johnson	W Stenger	C. Sanchez	Faultry	Peycke	Hubbard
6SF-RA	6RC-S	6SE-TE	6SF-T	6SF-RA	6SE-B	6RC-S	6SF
<i>m gm</i> <i>9/10/08</i>	<i>BN</i> <i>9/18/08</i>	<i>al</i> <i>9/23/08</i>	<i>w</i> <i>9/23/08</i>	<i>C. Sanchez</i> <i>9/23/08</i>	<i>Faultry</i> <i>9/23/08</i>	<i>Peycke</i> <i>9/23/08</i>	<i>Hubbard</i> <i>9/23/08</i>

of any hazardous substances found at the Site, and persons who accepted hazardous substances for transport and selected the site to which the hazardous substances were delivered.

Based on information collected and sent to you as enclosures to the July 2004 Notices, EPA believes that you may be liable under Section 107(a) of CERCLA with respect to the subject Site, as a current or previous owner and/or operator of the Site, or as a "generator," or arranger at the Site.

To date, EPA has taken certain response actions under CERCLA authority, including:

- Site Assessment and Expanded Site Inspection (ESI)
- Site Screening Inspection (SSI)
- Development of a Hazardous Ranking System (HRS) package
- Issuance of Notices of Liability
- Issuance of a Unilateral Administrative Order (UAO)
- Oversight of the remedial investigation to determine the nature and extent of contamination at the site
- Collection of investigation sample splits

Demand for Reimbursement of Costs

In accordance with Section 104 of CERCLA, EPA has taken certain response actions and incurred certain costs in response to conditions at the Site. The EPA is seeking to recover from you and other PRPs its response costs and all the interest authorized to be recovered under Section 107(a) of CERCLA. The approximate total response cost, identified through July 31, 2008, is \$874,779.88. Under Section 107(a) of CERCLA, EPA hereby makes a demand for payment from you and other PRPs for \$874,779.88, plus all interest authorized to be recovered under Section 107(a) of CERCLA. A summary of these costs is enclosed with this letter as "Itemized Cost Summary."

While this letter demands that you reimburse EPA for all funds spent or to be spent at the Site, EPA is aware that the financial ability of some PRPs to contribute toward the payment of response costs at a site may be substantially limited. If you believe, and can document, that you fall within this category, please submit financial records to substantiate your claim.

Some or all of the costs associated with this notice may be covered by current or past insurance policies issued to you. Most insurance policies will require that you timely notify your carrier(s) of a claim against you. To evaluate whether you should notify your insurance carrier(s) of this demand, you may wish to review current and past policies, beginning with the date of your first contact with the Site, up to the present. Coverage depends on many factors, such as the language of the particular policy and state law.

Your Response to EPA

Please make your payment for \$874,779.88 by certified or cashiers check payable to "EPA Hazardous Substance Superfund," and referencing the Gulfco Marine Maintenance Superfund Site, Site Spill ID Number 06JZ. Send the check, with your name and address, to:

U.S. Environmental Protection Agency
Superfund Payments
Gulfco Marine Maintenance Superfund Site SSID 06JZ
Cincinnati Finance Center
PO Box 979076
St. Louis, MO 63197-9000

A copy of your check and transmittal letter should be sent simultaneously to EPA addressed to:

Ms. Lydia Johnson, Section Chief
Enforcement Assessment Section, 6SF-TE
Superfund Division
U.S. EPA Region 6
1445 Ross Avenue
Dallas, TX 75202

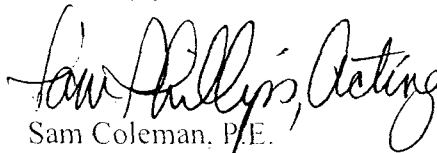
Your adherence to these procedures will ensure proper credit when payment is received.

If a response from you is not received *within fifteen (15) business days*, EPA will assume that you have declined to reimburse the Superfund for the Site expenditures, and pursuant to CERCLA, EPA may take other enforcement action.

Also, please note that, because EPA has a potential claim against you, you must include EPA as a creditor if you file for bankruptcy. The EPA reserves the right to file a proof of claim or an application for reimbursement of administrative expenses.

The EPA appreciates your giving this matter your immediate attention. If you have any questions regarding this letter, please contact Ms. Barbara Aldridge, Enforcement Officer, at (214) 665-2712. Legal questions may be directed to Ms. Barbara Nann, Assistant Regional Counsel, at (214) 665-2157. Technical questions regarding response actions may be directed to the Remedial Project Manager, Mr. Gary Miller, at (214) 665-8318. Thank you for your prompt attention.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Sam Coleman, P.E.", with a stylized flourish at the end.

Sam Coleman, P.E.
Director
Superfund Division

Enclosures

Addressee List - Updated Demand for Past Costs
Gulfco Marine Maintenance Superfund Site

For Dow Chemical Company:

Mr. James C. Morriss III
Thompson & Knight LLP
1900 San Jacinto Center
98 San Jacinto Blvd.
Austin, TX 78701-4081

For LDL Coastal Limited:

Mr. Alan Daniels
Attorney & Counselor at Law
1177 West Loop South, Suite 1725
Houston, TX 77027

For Sequa/Chromalloy Corporation:

Mr. F. William Mahey
Strasberger Attorneys at Law
1401 McKinney Street, Suite 2200
Houston, TX 77010-4035

For Parker Drilling:

Mr. John R. Eldridge
Haynes and Boone, LLP
1 Houston Center
1221 McKinney, Suite 2100
Houston, TX 77010

Mr. Ron Potter, Vice President and General Counsel
Parker Drilling Offshore Corporation
1401 Enclave Parkway, Suite 600
Houston, TX 77077

As Individuals:

Mr. Ronald W. Hudson
34 Green Slope Place
The Woodlands, TX 77381

Mr. Jack Palmer
1509 Alta Vista
Alvin, TX 77511

IFMS Reconciliation Pending

Itemized Cost Summary

GULFCO, FREEPORT, TX SITE ID = 06 JZ

UNRECONCILED COST FROM 10/01/1980 THOROUGH 07/31/2008
DEMAND FOR PAST COSTS

REGIONAL PAYROLL COSTS	\$285,320.08
HEADQUARTERS PAYROLL COSTS	\$4,380.10
REGIONAL TRAVEL COSTS	\$13,820.50
ENFORCEMENT SUPPORT SERVICES (ESS)	
TECHLAW, INC. (68-W0-0083)	\$2,593.96
SCIENCE APPLICATIONS INTERNATIONAL CORPORATION (68-W0-0091) ..	\$1,716.96
GRB ENVIRONMENTAL SERVICES, INC. (EPW05013)	\$9,803.90
ENVIRONMENTAL SERVICES ASSISTANCE TEAMS (ESAT)	
LOCKHEED MARTIN SERVICES, INC. (68-D6-0005)	\$9,135.53
INTERAGENCY AGREEMENT (IAG)	
DEPARTMENT OF INTERIOR (DW14922566)	\$2,015.46
DEPARTMENT OF JUSTICE (DW15893101)	\$2,464.67
RESPONSE ACTION CONTRACT SERVICES (RAC2)	
CH2M HILL, INC. (EPW06021)	\$3,239.60
RESPONSE ACTION CONTRACT SERVICES (RACS)	
CH2M HILL, INC. (68-W6-0036)	\$32,911.43
EA ENGINEERING, SCIENCE, AND TECHNOLOGY, INC. (EPW06004)	\$149,392.99
SUPERFUND COOPERATIVE AGREEMENT (SCA)	
TEXAS COMMISSION ON ENVIRONMENTAL QUALITY (98616401)	\$21,531.00
TECHNICAL SERVICES & SUPPORT	
MARASCO NEWTON GROUP, LTD. (68-W9-8105)	\$25,252.93
CONTRACT LAB PROGRAM (CLP) COSTS	
FINANCIAL COST SUMMARY	\$20,906.31

IFMS Reconciliation Pending

Itemized Cost Summary

GULFCO, FREEPORT, TX SITE ID = 06 JZ

UNRECONCILED COST FROM 10/01/1980 THORUGH 07/31/2008
DEMAND FOR PAST COSTS

MISCELLANEOUS COSTS (MIS)	\$25.48
EPA INDIRECT COSTS	\$290,268.98
Total Site Costs:	<u>\$874,779.88</u>